

**Kristi Cahoon Kelly**

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**From:** Kristi Cahoon Kelly  
**Sent:** Thursday, September 06, 2012 4:46 PM  
**To:** 'Ramana, Anand V.'  
**Cc:** 'Leonard Bennett'; Vicki Ward; Olga Macias  
**Subject:** RE: Rocabruna

Anand,

Thanks for your cooperation in working out the depositions. Can you give me specific dates for the 30b1, Sandra Evans and 30b6, so we can get those set? I will get the Rocabrunas to you as well for the week of the 24<sup>th</sup>. However, it may be best to get your people's availability first as they may have a more difficult schedule.

Also, if you can check on Urshay Hill again to see if she is employed with you, we would appreciate that.

Also, when you give us their availability, can you give us their locations so we can get a location, court reporter, etc?

Thanks,

Kristi Cahoon Kelly  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Tel: (703) 277-9774  
Fax: (703) 591-9285  
[kkelly@siplfirm.com](mailto:kkelly@siplfirm.com)

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**From:** Ramana, Anand V. [mailto:ARamana@mcguirewoods.com]  
**Sent:** Thursday, September 06, 2012 4:19 PM  
**To:** Kristi Cahoon Kelly  
**Subject:** RE: Rocabruna

Kristi:

To confirm, we agree to your proposal that you withdraw your motion to compel if we (1) agree to put up a 30(b)(1) witness who is the "most responsible person stateside in overseeing the Indian ACDV operators" (you stated that you are willing to do videoconference if that person is not in VA); (2) agree to put up Evans, who signed the declaration yesterday (also possibly by video), with the understanding that we prefer to do Evans on one day no matter what or how many capacities she is being deposed; and (3) agree to put up our 30(b)(6) the last week of September, which would give us time to work on our objections and resolve it prior to the deposition. We agree to do those things.

Indeed, all depositions will be scheduled in late September to the best of our ability. We agree to a two week extension of your expert report. That is, of course, only if we got the same courtesy.

Thanks for your cooperation,

Anand V. Ramana  
McGuireWoods LLP  
2001 K Street, NW  
Washington, DC 20006  
202.857.1734 (Direct Line)



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**From:** Kristi Cahoon Kelly [<mailto:kkelly@siplfirm.com>]  
**Sent:** Thursday, September 06, 2012 4:02 PM  
**To:** Ramana, Anand V.  
**Subject:** RE: Rocabruna

Yes- will do now.

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**From:** Ramana, Anand V. [<mailto:ARamana@mcguirewoods.com>]  
**Sent:** Thursday, September 06, 2012 4:01 PM  
**To:** Kristi Cahoon Kelly  
**Subject:** RE: Rocabruna

Can you call me?

Anand V. Ramana  
McGuireWoods LLP  
2001 K Street, NW  
Washington, DC 20006  
202.857.1734 (Direct Line)  
202.828.2973 (Direct Facsimile)  
[aramana@mcguirewoods.com](mailto:aramana@mcguirewoods.com)

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**From:** Kristi Cahoon Kelly [<mailto:kkelly@siplfirm.com>]  
**Sent:** Thursday, September 06, 2012 12:15 PM  
**To:** Ramana, Anand V.  
**Subject:** RE: Rocabruna

Great, thanks. Please call my direct line below.

Kristi Cahoon Kelly  
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**From:** Ramana, Anand V. [<mailto:ARamana@mcguirewoods.com>]

**Sent:** Thursday, September 06, 2012 12:13 PM

**To:** Kristi Cahoon Kelly

**Subject:** RE: Rocabruna

Sure - ten minutes?

Anand V. Ramana  
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2001 K Street, NW  
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**From:** Kristi Cahoon Kelly [<mailto:kkelly@siplfirm.com>]

**Sent:** Thursday, September 06, 2012 11:00 AM

**To:** Ramana, Anand V.

**Subject:** RE: Rocabruna

Can you give me a call when you get a chance?

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**From:** Ramana, Anand V. [<mailto:ARamana@mcguirewoods.com>]

**Sent:** Wednesday, September 05, 2012 2:20 PM

**To:** Kristi Cahoon Kelly

**Subject:** RE: Rocabruna

Anand V. Ramana  
McGuireWoods LLP  
2001 K Street, NW  
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**From:** Kristi Cahoon Kelly [<mailto:kkelly@siplfirm.com>]  
**Sent:** Wednesday, September 05, 2012 2:18 PM  
**To:** Ramana, Anand V.  
**Subject:** RE: Rocabruna

Sure- what dates are you thinking?

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**From:** Ramana, Anand V. [<mailto:ARamana@mcguirewoods.com>]  
**Sent:** Wednesday, September 05, 2012 2:11 PM  
**To:** Kristi Cahoon Kelly  
**Subject:** Rocabruna

Kristi,

Do you have a few minute to discuss dates for the Rocabrunas' depositions?

Thanks,

Anand V. Ramana  
McGuireWoods LLP  
2001 K Street, NW  
Washington, DC 20006  
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